

CERTIFICATION

I, Dr. Iliana Torres Mojica, of legal age, Medical Services Corporate Director for Correctional Health Services Corp., hereby certify that:

- 1. Mr. Jose Julian Cruz Berrios is an inmate under the custody of the Department of Corrections, currently living in the Bayamon Correctional Complex, specifically in the Correctional Institution 501.
- 2. Mr. Cruz Berrios has Diabetes Mellitus, type 2, which is a chronic, lifelong condition.
- For the monitoring and treatment of his medical condition, Mr. Cruz Berrios is followed, monthly, by the Internist, Dr. Florentino Figueroa, in the Bayamon Correctional Complex Chronic Conditions Clinic. His next appointment is scheduled for August 29, 2017.
- 4. Mr. Cruz Berrios is also periodically followed in the external clinics of Endocrinology, Gastroenterology and Urology. His next medical appointments in the external clinics are scheduled as follows:
 - a. Urology September 11, 2017
 - b. Endocrinology- October 5, 2017
- 5. Regarding the Gastroenterology service, the specialist ordered a Colonoscopy, which was scheduled for May 19, 2017. Mr. Cruz Berrios refused to go through with the study, because he didn't accept to follow the necessary preparation procedure.
- 6. Mr. Cruz Berrios will be evaluated by the Podiatrist on August 31, 2017.
- 7. Mr. Cruz Berrios also receives medical treatment for his mental health conditions. His most recent Psychiatrist evaluation occurred on May 5, 2017. The Psychiatrist renewed his medications and ordered a follow up evaluation in three months. His next appointment is scheduled for September 5, 2017.
- 8. Mr. Cruz Berrios, like every other inmate, has continuous access to medical services at the correctional institutions. On weekdays, from 8:30 a.m. through 4:30 p.m., they have access to a general practitioner, through the Sick Call service, available in every correctional

Jose Julián Cruz Berrios v. CHSC, 3:16-cv-03155-PAD

August 29, 2017

institution. During the nights and weekends, they have access to medical attention through the Correctional Complex Emergency Room.

9. According to the recommendations of the endocrinologist, insulin should be administered to Mr. Cruz Berrios in the following doses:

Breakfast

Lantus – 30 units before breakfast

Humalog – 17 units with breakfast

Lunch

Humolog 12 units with lunch

Dinner

Humolog 12 units with dinner

Lantus 20 units with dinner

- 10. Mr. Cruz Berrios eats his food in the living area and is immediately transferred to the medical area to get his insulin doses. Before administering the insulin doses to Mr. Cruz Berrios, a dextrose test is performed to validate the levels of sugar in blood.
- 11. Mr. Cruz Berrios continuously alleges that he has not been receiving the insulin treatment as ordered by his attending physicians. To address his allegations, last May our Quality of Services Division performed an analysis of Mr. Cruz Berrios' insulin administration process. The results of said analysis are the following:

Breakfast

The food truck arrives at the facility between 5:45 and 6:00 a.m.

The average time of Lantus administration is 6:55 a.m.

The average hour in which the food is delivered to Mr. Cruz Berrios is at 7:20 a.m.

Humalog's average time of administration is 8:02 a.m.

Lunch

The truck with the lunch arrives at the institution between 10:15 and 10:30 a.m.

The average hour in which lunch is delivered to Mr. Cruz Berrios is 12:04 p.m.

Jose Julián Cruz Berrios v. CHSC, 3:16-cv-03155-PAD

August 29, 2017

The average time of Humalog administration is 12:28 p.m.

Dinner

The truck with the dinner arrives at the facility between 2:20 and 2:50 p.m.

The average hour at which dinner is delivered to Mr. Cruz Berrios is 4:32 p.m.

The average time of administration of the Lantus and Humalog to Mr. Cruz Berrios is 5:22 p.m.

- 12. From the analysis performed we understand that the Endocrinologist's recommendations, regarding the insulin doses, are being followed.
- 13. It is important to state that since July 29, 2017, Mr. Cruz Berrios has been refusing the insulin doses, as a mechanism to request the nutritional supplement Glucerna. However, there are no clinical indications for said supplement.
- 14. Mr. Cruz Berrios has a special medical diet, which includes snacks and, to the best of my knowledge, he receives the medical diet as ordered.

IN WITNESS THEREOF, I sign this document in Guaynabo, Puerto Rico; on August 29, 2017.

ILIANA TORRES MOJICA